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[10744/2500]

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**
**BOARD OF PATENT APPEALS AND INTERFERENCES**

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| In re Application of: | | |
| | Eberhard HOLL | Examiner: T. NGUYEN |
| For: | METHOD AND DEVICE FOR DETECTING THE COMPLETE STOP OF A VEHICLE | Art Unit: 3661 |
| Filed: | December 22, 2000 | |
| Serial No.: | 09/748,341 | |



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Date: March 26, 2004

Signature: R.L.M. Reg. No. 42,194

## REPLY BRIEF TRANSMITTAL

SIR:

Transmitted herewith for filing in the above-identified patent application please find a Reply Brief pursuant to 37 C.F.R. § 1.193(b), in triplicate.

While no fee is believed to be due, the Commissioner is authorized to charge, as necessary and/or appropriate, any additional and appropriate fees or credit any overpayment to Deposit Account No. **11-0600**. A duplicate copy of this transmittal letter is enclosed for that purpose.

Respectfully submitted,

Dated: March 26, 2004 By: R.L.M. Reg. No. 42,194

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[10744/2500]

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Signature: _____
Richard L. Mayer

## REPLY BRIEF PURSUANT TO 37 C.F.R. § 1.193(b)

S I R:

Appellant submits this Reply Brief, the two-month response date for which is March 26, 2004, in response to the Examiner's Answer ("the Answer"), which was mailed on January 26, 2004. Although not required, two duplicate copies of this Reply Brief are also being submitted herewith as a courtesy to the Board.

For the reasons set forth in the Appeal Brief and those set forth below, it is again respectfully submitted that the final rejections of claims 1 to 36 should be reversed.

## REMARKS

### I. Introduction

Claims 1, 17, and 36 stand finally rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 5,129,496 ("Sigl et al.").

Claims 2 to 16 and 18 to 35 stand finally rejected under 35 U.S.C. 103(a) as unpatentable over the combination of Sigl et al. and United Kingdom Published Patent Application No. 2 297 619 ("Masur").

Appellant incorporates herein the arguments previously presented in the Appeal Brief filed on October 9, 2003. In addition, the following comments are presented to further highlight the differences between the claims and the applied references.

### II. Grouping of Claims

The Answer contends that claims 2 to 16 and 18 to 35 should stand or fall together with claims 1, 17, and 36 of group I allegedly because "[A]ppellant's brief does not include a statement that this grouping of claims does not stand or fall together and reasons in support thereof." Answer at p. 3. Appellant respectfully notes that a statement regarding whether claims stand or fall together is only applicable for ***each ground of rejection***, i.e., separate grounds of rejection are automatically treated independently. See 37 C.F.R. 1.192(c)(7) ("For each ground of rejection, . . . the Board shall select a single claim from the group and shall decide the appeal as to the ground of rejection on the basis of that claim alone unless a statement is included that the claims of the group do not stand or fall together"). Appellant notes that claims 2 to 16 and 18 to 35 were rejected under ***a separate ground of rejection*** from claims 1, 17, and 36, so claims 2 to 16 and 18 to 35 **must** be treated independently from claims 1, 17, and 36.

## III. Status of Claims

Appellant thanks the Examiner for noting the typographic error in claim 8 in the Appendix to the Appeal Brief. Attached in the Appendix hereto is a copy of the appealed claims with the typographic error to claim 8 corrected.

## IV. Arguments

### A. Rejection of Claims 1, 17, and 36 Under § 102(b)

Claims 1, 17, and 36 stand finally rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 5,129,496 ("Sigl et al."). It is respectfully submitted that the rejection should be reversed for the following reasons.

The Answer states -- for the first time during prosecution of the present application -- that "Sigl [et al.] inherently teach[] calculating the instant of complete stop as a function of the vehicle speed and the brake force as claimed," Answer at p. 4, and that "Sigl [et al.] inherently teach determining the time the vehicle will be completely stopped using the vehicle speed as claimed," Answer at p. 7.

To anticipate a claim, "[t]he identical invention must be shown in as complete detail as is contained in the . . . claim," Richardson v. Suzuki Motor Co., supra, and the prior art must describe the elements arranged as required by the claims, In re Bond, supra.

Sigl et al. state that "a brake control system [is] for automatically applying a brake pressure when the vehicle speed drops below a very low speed value and the brake pedal is operated". Col. 1, lines 5 to 8. Also, Sigl et al. state that in order to detect that the brake pedal is operated, "a brake light signal (BLS) switch is coupled in via terminal 7." Col. 2, lines 66 to 67.

It is respectfully submitted that Sigl et al. do not present **each and every element** of claims 1, 17, and 36 in **as complete detail** as is contained in claims 1, 17, and 36. For example, Sigl et al. state that braking pressure is applied

when the vehicle speed drops below a very low speed value and the brake pedal is operated, a switch is coupled when the brake pedal is operated. Additionally, Sigl et al. state "that when reaching a small vehicle reference speed, e.g. 10 km/h, the measured vehicle deceleration, is used to calculate when the vehicle will come to a complete stop when maintaining the deceleration and that at this calculated point in time, the brake pressure is supplied and maintained. In addition, this calculating and supplying procedure can be made dependent upon operation of the brake." Col. 4, lines 18 to 26. However, claims 1, 17, and 36 include the detail that a complete stop of a vehicle is determined as a function of one quantity representing braking force when the vehicle is braked. This additional detail is important because it distinguishes between a representation of braking force, from an operation status of a brake pedal. Sigl et al. appear to be describing the former -- that is, an operation status of brake pedal -- because there is no determination, inherent or otherwise, of a quantity representing brake force. A brake pedal operation status does not **necessarily** constitute, as it must for inherency, a quantity representing braking force when the vehicle is braked. Therefore, the operation status of a brake pedal is not the same as determining a complete stop of a vehicle as a function of one quantity representing braking force when the vehicle is braked, as recited in claims 1, 17, and 36.

As regards the new allegations of inherency, "[i]n relying upon the theory of inherency, the examiner must provide a basis in fact and/or technical reasoning to reasonably support the determination that the allegedly inherent characteristic necessarily flows from the teachings of the applied prior art." Ex parte Levy, 17 U.S.P.Q.2d 1461, 1464 (emphasis in original). Neither the Answer nor the Office Actions to date provide any such indication. Indeed, the Final Office Action states that "the prior art references herein applied clearly teach determining that which it is alleged they teach, and therefore there is no 'inherent' or

non-disclosed aspect of these two references which is deemed to be an 'inherent' aspect." Final Office Action at p. 5. Clearly the Answer and Final Office Action are contradictory. Of course, "[i]nherency . . . may not be established by probabilities or possibilities" and that "[t]he mere fact that a certain thing may result from a given set of circumstances is not sufficient." Ex parte Skinner, 2 U.S.P.Q.2d 1788, 1789 (Bd. Pat. App. & Inter. 1986). It is therefore respectfully submitted that there is nothing in the record to support the contention -- and indeed, the Final Office Action specifically contradicts the contention -- that "Sigl [et al.] inherently teach[] calculating an instant of complete stop as a function of the vehicle speed and the brake force as claimed" as now, for the first time, alleged in the Answer.

The Answer contends -- also for the first time during prosecution of this application -- that "detecting complete stop" should be interpreted to mean "calculating the instant of time the vehicle will completely stop" and that claims 1, 17 and 36 should be read as "determining the time (or the future location) the vehicle will completely stop using the brake force and the vehicle speed." Answer at pp. 6 to 7. The foregoing is nothing more than an attempt to read limitations into the claims, which is, of course, improper.

The Answer admits that Sigl et al. "do[] not teach using the status of braking the vehicle in calculating the time the vehicle will stop." Answer at p. 9. The Answer contends, however, that the claims "do not mention the relation between status of the brake and calculation of the time the vehicle will stop" and states that "[t]he examiner does not at all rely on the brake status of the vehicle to reject claims 1, 17 and 36." As regards the status of the brake, claim 1 recites that the complete stop is detected: (1) **as a function of one quantity representing braking force when the vehicle is braked**; and (2) as a function of one of the vehicle's speed and the speed of at least one of the vehicle's wheel. Furthermore, claim 17 recites the step of detecting the complete stop of a vehicle: (1) as a function of one

quantity representing a braking force when the vehicle is braked; and (2) as a function of one of a vehicle speed and a speed of the at least one vehicle wheel. Moreover, claim 36 recite that an arrangement is configured to detect a complete stop of a vehicle: (1) **as a function of a quantity that represents a braking force when the vehicle is braked**; and (2) as a function of one of a vehicle speed and a speed of at least one vehicle wheel. Thus, in addition to attempting to read certain limitations **into** the claim, the Answer is improperly attempting to read certain limitations **out of** the claims, namely, that the braking force is a factor in determining the complete stop of the vehicle. Since the Answer expressly admits that "Sigl [et al.] do[] not teach using the status of braking of the vehicle in calculating the time the vehicle will stop" and admits that "the braking status of the vehicle [is not relied upon at all] to reject claims 1, 17, and 36," it is respectfully submitted that the Answer makes plain that Sigl et al. do not anticipate claims 1, 17 and 36.

In addition, the Answer appears to equate operation of a brake with a quantity representing a braking force. See Answer at p 8. However, Sigl et al. apparently use the parameter of **whether** a brake is operated but do not use any quantity that represents a **braking force** during operation of a brake. The text of the Answer in Section a, pages 5 to 9, ignore this distinction between the brake described by Sigl et al. and the subject matter of the present claims. The Answer's statement that "stronger evidence that undeniably shows [Sigl et al.'s] suggestion to include brake pressure in calculating the instant the vehicle will stop can be found in col. 4, lines 24-26." Answer at p. 8. Appellant respectfully disagrees. At col. 4, lines 24 to 26, Sigl et al. merely state that the "calculating and supplying procedure can be made dependent upon **operation of the brake**" (emphasis added). Sigl et al., however, make no mention of any quantity that represents **braking force**. Thus, the Answer's contention is,

at best, based on nothing more than pure speculation or conjecture. The Answer asserts that lines 1 to 2 of the Abstract "teaches the fact that the brake pressure changes according to operation of the brake pedal (operation of the brake)." Answer at p. 8. However, the Abstract states at lines 1 to 2 that "[b]rake pressure is increase when the brake pedal is operated." This statement does not support the Answer's position since it is taken completely out of context. In this regard, the Abstract states that "[b]rake pressure is increased when the brake pedal is operated and the vehicle falls short of a very slow reference speed $v_x$, which value is variable and increases as the vehicle deceleration increases. The pressure is maintained until the throttle is applied." The "brake pressure" referred to in the Abstract is the brake pressure that is applied by the brake control system when the following two conditions are met: (1) the vehicle drops below a very low speed; and (2) the brake pedal is operated. Thus, contrary to the Answer's interpretation, the Abstract does not support the contentions that Sigl et al. "does suggest including the brake pressure in determining the time the vehicle will stop" and that "[Sigl et al.'s] suggestion enough and fully reads on . . . claims 1, 17 and 36." It appears that the Answer acknowledges the deficiencies of Sigl et al. in that the Answer states that Sigl et al. "do[] not elaborate on how the calculation of the time the vehicle will stop would be calculated using both the vehicle speed and the brake force." Answer at p. 8.

In summary, is respectfully submitted that Sigl et al. do not disclose, or even suggest, all of the features of claims 1, 17, and 36 and, therefore, does not anticipate claims 1, 17, and 36. In view of the foregoing and the reasons more fully set forth in the Appeal Brief, it is respectfully requested that the final rejection of claims 1, 17, and 36 be reversed.

2. **Rejection of Claims 2 to 16 and 18 to 35 Under § 103(a)**

Claims 2 to 16 and 18 to 35 stand finally rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of Sigl et al. and Masur. It is respectfully submitted that the rejection should be reversed for the following reasons and for the reasons more fully set forth in the Appeal Brief.

In rejecting a claim under 35 U.S.C. § 103(a), the Examiner bears the initial burden of presenting a prima facie case of obviousness. In re Rijckaert, 9 F.3d 1531, 1532, 28 U.S.P.Q.2d 1955, 1956 (Fed. Cir. 1993). To establish prima facie obviousness, three criteria must be satisfied. First, there must be some suggestion or motivation to modify or combine reference teachings. In re Fine, 837 F.2d 1071, 5 U.S.P.Q.2d 1596 (Fed. Cir. 1988). This teaching or suggestion to make the claimed combination must be found in the prior art and not based on the application disclosure. In re Vaeck, 947 F.2d 488, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991). Second, there must be a reasonable expectation of success. In re Merck & Co., Inc., 800 F.2d 1091, 231 U.S.P.Q. 375 (Fed. Cir. 1986). Third, the prior art reference(s) must teach or suggest all of the claim limitations. In re Royka, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974).

Claims 2 to 15 depend from claim 1 and therefore includes all of the features of claim 1, and claims 18 to 35 depend from claim 17 and therefore includes all of the features of claim 17. It is, therefore, respectfully submitted that claim 2 to 15 are not rendered unpatentable by the combination of Sigl et al. and Masur for at least the same reasons given above in support of claim 1 and that claims 18 to 35 are not rendered unpatentable by the combination of Sigl et al. and Masur for at least the same reasons given above in support of claim 17.

Claim 16 also recites that a complete stop of vehicle is detected as a function of a quantity representing a braking force when the vehicle is braked. It is, therefore,

respectfully submitted that claim 16 is not rendered unpatentable by the combination of Sigl et al. and Masur.

As for claims 9 to 15, the Answer contends that "using average brake pedal instead of instantaneous brake pressure, and determine the inclination of a road using a look up table having characteristic curves would have been obvious to a person of ordinary skill in the art" but provides no support for this assertion. However, even though Appellant does not necessarily agree with this assertion, even if it were true, it still would not provide a basis for rejection of the claims. This assertion only states that the references purportedly disclose considering the road gradient, use of the average brake pressure and determination of road inclination via a look up table. However, claims 9 to 15 depend from claim 1 which recites detecting a complete stop as a function of a quantity representing brake force.

Therefore, even if the Answer's assertion is correct, and Appellant does not necessarily agree that it is, the combination of Sigl et al. and Masur still does not disclose all of the features of the claims.

In summary, it is respectfully submitted that the combination of Sigl et al. and Masur does not disclose, or even suggest, all of the limitations of claims 2 to 16 and 18 to 35. It is, therefore, respectfully submitted that the combination of Sigl et al. and Masur does not render unpatentable claims 2 to 16 and 18 to 35, and it is respectfully requested that the final rejection of these claims be reversed.

## V. Conclusion

For at least the reasons indicated above and the reasons more fully set forth in the Appeal Brief, Appellant respectfully submits that the art of record does not teach or suggest Appellant's invention as recited in the claims of the above-identified application. Accordingly, it is respectfully submitted that the invention recited in the claims of the present application is new, non-obvious and useful. Reversal

of the rejections of the claims is therefore respectfully requested.

Respectfully submitted,

Dated: March 26, 2004 By: _____

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**APPENDIX**

1. A method for detecting the complete stop of a vehicle, the complete stop being detected as a function of one quantity representing braking force when the vehicle is braked and as a function of one of the vehicle's speed and the speed of at least one of the vehicle's wheels.

2. The method according to Claim 1, characterized in that the complete-stop detection is also carried out as a function of at least two speed thresholds, a first speed threshold (v1) and a second speed threshold (v2).

3. The method according to Claim 2, characterized in that the second speed threshold (v2) essentially corresponds to the speed below which the vehicle's speed can no longer be measured using the measuring method implemented in the vehicle.

4. The method according to Claim 2, characterized in that the second speed threshold (v2) is between 1.5 km/h and 3.0 km/h.

5. The method according to Claim 2, characterized in that the first speed threshold (v1) is established as a function of the vehicle's driving situation.

6. The method according to Claim 2, characterized in that the first speed threshold (v1) is selected in such a way that the vehicle's engine is uncoupled.

7. The method according to claim 2, characterized in that the first speed threshold (v1) is between 3.0 km/h and 6.0 km/h, preferably between 4.0 km/h and 5.0 km/h.

8. The method according to claim 2, characterized in that an average deceleration value (a) is generated from the difference between the first speed threshold (v1) and the

second speed threshold (v2), as well as from the time period (t2-t1) in which the vehicle's speed (v) has a value between the first speed threshold (v1) and the second speed threshold (v2) during braking.

9. The method according to Claim 8, characterized in that a characteristic curve between vehicle deceleration (a) and quantity (pB) representing the braking force is selected as a function of the average deceleration value (a) and average value (pB) of the quantity representing the braking force during the time period (t2-t1) in which the vehicle's speed (v) has a value between first speed threshold (v1) and second speed threshold (v2) during braking.

10. The method according to Claim 9, characterized in that while the vehicle is traveling at a speed (v) below the second speed threshold (v2), the instantaneous vehicle deceleration (aH+β pB, βpB) is determined from the quantity (Pn) representing the braking force using the selected characteristic curve, and in that at least one of the quantities, complete-stop instant of the vehicle and complete-stop location of the vehicle, is determined using instantaneous deceleration (aH+β pB, βpB).

11. The method according to claim 1, in particular when the vehicle has a hydraulic brake, characterized in that braking pressure (pB) of the brake, of a hydraulic brake in particular, is the quantity representing the braking force.

12. The method according to Claim 11, characterized in that the characteristic curve between vehicle deceleration (af) and the braking pressure (PB) for a braking pressure (pB) up to 20 bar, in particular up to 10 bar, is selected so that the inclination of the roadway on which the vehicle is braking is an arbitrary parameter of a family of characteristics between vehicle deceleration (af) and braking pressure (PB).

13. The method according to claim 11, characterized in that for a braking pressure (pB) above 10 bar, in particular above 20 bar, the characteristic curve between vehicle deceleration (af) and braking pressure (pB) is selected in such a way that the vehicle's mass is an arbitrary parameter of a family of characteristics between vehicle deceleration (af) and braking pressure (pB).

14. The method according to claim 8, characterized in that at least one of the values

- vehicle acceleration conditional upon the inclination of the roadway on which the vehicle is braking; and
- mass of the vehicle is determined as a function of the average deceleration value (a) and of the value of the quantity (pB) representing the braking force for the time period in which the vehicle's speed has a value between first speed threshold (v1) and second speed threshold (v2) during braking.

15. The method according to Claim 14, characterized in that starting the vehicle after a complete stop occurs as a function of at least one of the values

- vehicle acceleration conditional upon the inclination of the roadway on which the vehicle is braking; and
- mass of the vehicle.

16. A device (5, 32, 47) for detecting the complete stop of a vehicle as a function of the vehicle's speed in accordance with claim 1, characterized in that the device (5, 32, 47) for detecting a complete stop detects the complete stop of a vehicle as a function of the vehicle's speed or of the speed of at least one of the vehicle's wheels and as a function of a quantity (pB), which represents the braking force when the vehicle is braked.

17. A method for detecting a complete stop of a vehicle, comprising the step of:

detecting the complete stop as a function of one quantity representing a braking force when the vehicle is braked and as a function of one of a vehicle speed and a speed of at least one vehicle wheel.

18. The method according to claim 17, wherein the complete stop is detected in the complete stop detecting step as a function of the one quantity representing the braking force when the vehicle is braked, as a function of the one of the vehicle speed and the speed of the at least one vehicle wheel and as a function of at least two speed thresholds.

19. The method according to claim 18, wherein the at least two speed thresholds includes a first speed threshold and a second speed threshold.

20. The method according to claim 19, wherein the second speed threshold substantially corresponds to a speed below which the vehicle speed can not be measuring in accordance with a measuring method performed by the vehicle.

21. The method according to claim 19, wherein the second speed threshold is between 1.5 km/h and 3.0 km/h.

22. The method according to claim 19, further comprising the step of establishing the first speed threshold as a function of a vehicle driving situation.

23. The method according to claim 19, further comprising the step of selecting the first speed threshold so that a vehicle engine is uncoupled.

24. The method according to claim 19, wherein the first speed threshold is between 3.0 km/h and 6.0 km/h.

25. The method according to claim 19, wherein the first speed threshold is between 4.0 km/h and 5.0 km/h.

26. The method according to claim 19, further comprising the step of generating an average deceleration value from a difference between the first speed threshold and the second speed threshold and from a time period in which the vehicle speed has a value between the first speed threshold and the second speed threshold during braking.

27. The method according to claim 26, further comprising the step of selecting a characteristic curve between a vehicle deceleration and the quantity representing the braking force as a function of the average deceleration value and an average value of the quantity representing the braking force during the time period in which the vehicle speed has a value between the first speed threshold and the second speed threshold during braking.

28. The method according to claim 27, further comprising the steps of:

determining, while the vehicle is traveling at a speed below the second speed threshold, an instantaneous vehicle deceleration from the quantity representing the braking force using the characteristic curve selected in the characteristic curve selecting step; and

determining a complete-stop instant of the vehicle and a complete-stop location of the vehicle in accordance with the instantaneous deceleration.

29. The method according to claim 17, wherein the vehicle includes a hydraulic brake, the quantity representing the braking force including a braking pressure of the brake.

30. The method according to claim 27, wherein the vehicle includes a hydraulic brake, the quantity representing the braking force including a braking pressure of the brake,

the characteristic curve is selected in the characteristic curve selecting step between the vehicle deceleration and the braking pressure for a braking pressure up to 20 bar so that an inclination of a roadway on which the vehicle is braking is an arbitrary parameter of a family of characteristics between the vehicle deceleration and the braking pressure.

31. The method according to claim 27, wherein the vehicle includes a hydraulic brake, the quantity representing the braking force including a braking pressure of the brake, the characteristic curve is selected in the characteristic curve selecting step between the vehicle deceleration and the braking pressure for a braking pressure up to 10 bar so that an inclination of a roadway on which the vehicle is braking is an arbitrary parameter of a family of characteristics between the vehicle deceleration and the braking pressure.

32. The method according to claim 30, wherein, for a braking pressure above 10 bar, the characteristic curve is selected in the characteristic curve selecting step between the vehicle deceleration and the braking pressure so that a vehicle mass is an arbitrary parameter of a family of characteristics between the vehicle deceleration of the braking pressure.

33. The method according to claim 30, wherein, for a braking pressure above 20 bar, the characteristic curve is selected in the characteristic curve selecting step between the vehicle deceleration and the braking pressure so that a vehicle mass is an arbitrary parameter of a family of characteristics between the vehicle deceleration of the braking pressure.

34. The method according to claim 26, further comprising the step of determining, as a function of the average deceleration value and a value of the quantity representing the braking force of the time period in which the vehicle

speed has a value between the first speed threshold and the second speed threshold during braking, at least one of vehicle acceleration conditional upon an inclination of a roadway on which the vehicle is braking and a mass of the vehicle.

35. The method according to claim 34, further comprising the step of starting the vehicle after a complete stop occurs as a function of at least one of the vehicle acceleration conditional upon the inclination of the roadway on which the vehicle is braking and the mass of the vehicle.

36. A device, comprising:

an arrangement configured to detect a complete stop of a vehicle as a function of a quantity that represents a braking force when the vehicle is braked and as a function of one of a vehicle speed and a speed of at least one vehicle wheel.